



Air Quality Permitting Response to Public Comments

August 17, 2018

**Permit to Construct and Tier II Operating Permit
No. T2-2016.0064**

Project No. 61813

**ON Semiconductor
Nampa, Idaho**

Facility ID No. 027-00095

Prepared by:
Shawnee Chen, P.E. Senior Air Quality Engineer
AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed Permit to Construct and Tier II Operating Permit for ON Semiconductor – Nampa from July 5 to August 6, 2018, in accordance with IDAPA 58.01.01. 404.01.c. During this period, comments were submitted in response to DEQ’s proposed action. Each comment and DEQ’s response is provided in the following section. All comments submitted in response to DEQ’s proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department’s technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: Permit Condition 7.1: The permittee currently has two emergency stationary compression ignition (CI) engines. These engines are used to power electrical generators and fire-water pumps at the facility. The permittee performs routine testing and maintenance on these units.

The two emergency stationary CI engines are only used to power electrical generators. ON Nampa does not have fire-water pumps onsite. ON Nampa is requesting permit condition 7.1 be updated to remove the reference to fire-water pumps at the facility.

Response 1: Revised - “and fire-water pumps” is removed from Permit Condition 7.1. “and fire-water pumps” is also removed from Permit Conditions 3.4.1 and 3.5.1.

Comment 2: Thermal Processing Unit Description: Permit Condition 4.6.2 Emissions routed to the TPU shall be routed through a VOC abatement unit when VOC abatement units are operating and through the wet scrubber when no VOC abatement units are operating.

Permit Condition 4.6.2 states that the TPU shall be routed through a VOC abatement units and through the wet scrubber when no VOC abatement units are operating. This description is not consistent with the description included in the Impact Modeling Analyses Report submitted in October 2017. The October 2017 Impact Modeling Analyses Report accurately describes the TPU exhaust as follows:

"Two TPUs are proposed for future growth for this facility. A TPU will be used to treat specific manufacturing process gas streams such as perfluorinated compound gas species. A TPU consists of a natural gas direct fired combustor coupled with its own scrubber system for the removal of toxic exhaust gases. Each TPU is proposed to be connected to the existing packed-bed wet chemical scrubber system (uncontrolled scenario) or to the existing VOC abatement units (controlled scenario). Emission rates are based on AP-42, Section 1.4 Natural Gas Combustion emission factors. No additional control efficiency is proposed for the TPUs as the treated exhaust stream will be sent out to the atmosphere via the packed-bed wet chemical scrubber system or voc abatement units. Emissions for two TPU s were calculated based on uncontrolled natural gas operations only."

Response 2: Permit Condition 4.6.2 is revised and read as following:

“4.6.2 Emissions from the TPU shall be routed through either the VOC abatement units or the wet scrubber system.”

Appendix

Public Comments Submitted for

**Permit to Construct and Tier II Operating Permit
No. T2-2016.0064**

Project No. 61813



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Aptina, LLC
1401 N. Kings Road
Nampa, Idaho 83687

July 10, 2018

Idaho Department of Environmental Quality
Air Quality Division
1410 North Hilton
Boise, ID 83706

Subject: Facility ID No. 027-00095, ON Semiconductor - Nampa, Nampa
Draft Tier II Operating Permit for for Public Comment

ON Semiconductor- Nampa (ON Nampa) has reviewed the draft Tier II operating permit and Statement of Basis (SOB) for Public Comment received on June 26, 2018. ON Nampa is requesting two changes be incorporated in the final permit and SOB.

Permit Condition 7.1: *The permittee currently has two emergency stationary compression ignition (CI) engines. These engines are used to power electrical generators and fire-water pumps at the facility. The permittee performs routine testing and maintenance on these units.*

The two emergency stationary CI engines are only used to power electrical generators. ON Nampa does not have fire-water pumps onsite. ON Nampa is requesting permit condition 7.1 be updated to remove the reference to fire-water pumps at the facility.

Thermal Processing Unit Description: *Permit Condition 4.6.2 Emissions routed to the TPU shall be routed through a VOC abatement unit when VOC abatement units are operating and through the wet scrubber when no VOC abatement units are operating.*

Permit Condition 4.6.2 states that the TPU shall be routed through a VOC abatement units and through the wet scrubber when no VOC abatement units are operating. This description is not consistent with the description included in the Impact Modeling Analyses Report submitted in October 2017. The October 2017 Impact Modeling Analyses Report accurately describes the TPU exhaust as follows:

"Two TPUs are proposed for future growth for this facility. A TPU will be used to treat specific manufacturing process gas streams such as perfluorinated compound gas species. A TPU consists of a natural gas direct fired combustor coupled with its own scrubber system for the removal of toxic exhaust gases. Each TPU is proposed to be connected to the existing packed-bed wet chemical scrubber system (uncontrolled scenario) or to the existing VOC abatement units (controlled scenario). Emission rates are based on AP-42, Section 1.4 Natural Gas Combustion emission factors.

No additional control efficiency is proposed for the TPUs as the treated exhaust stream will be sent out to the atmosphere via the packed-bed wet chemical

scrubber system or VOC abatement units. Emissions for two TPUs were calculated based on uncontrolled natural gas operations only."

ON Nampa is requesting that the TPU exhaust description be updated in the operating permit and SOB to reflect the description outlined in the October 2017 Impact Modeling Analyses Report. The TPU will be connected to the existing packed-bed wet chemical scrubber system or to the existing VOC abatement units not through a VOC abatement unit and if no VOC abatement unit is operating then through the wet scrubber.

This change does not affect emission estimates since the emissions from the TPU were calculated based on uncontrolled natural gas operations only, with no additional control efficiency assumed.

Sincerely,



Shane Brown
Facilities Manager